

### **REMARKS**

Applicants respectfully request reconsideration of this application. Claims 1-28 were pending. Claims 1, 3-19, and 21-28 have been amended to remove minor informalities. Applicants respectfully submit that no new matter has been introduced by the amendments. No claims have been added or canceled. Claims 1-28 remain pending.

#### **Rejections Under 35 U.S.C. § 102(e)**

Claims 1-9, 11-17 and 19-27 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,754,885 of Dardinski ("Dardinski"). Applicants respectfully traverse the rejection.

Independent claim 1 sets forth dynamically generating user interface display **code** at run time, the user interface display code based upon the set of configuration parameters. It was alleged in the final Office Action that the "parameterized object" in Dardinski can be the user interface display code (final Office Action, p. 4, right column, ln. 5-8). Applicants respectfully disagreed. According to Dardinski, the parameterized objects represent *data*, not user interface display **code** (for example, see Dardinski, col. 10, ln. 30-43). Dardinski never discloses or suggests that the parameterized objects include user interface display code. Therefore, Dardinski fails to disclose at least the limitation of dynamically generating user interface display code at run time, the user interface display code based upon the set of configuration parameters. For at least this reason, Dardinski fails to anticipate claim 1.

Independent claims 11 and 19 also recite “to dynamically generate user interface display code at run time ..., the user interface display code based upon the set of configuration parameters” and “dynamically generating user interface display code at run time, the user interface display code based upon the set of configuration parameters,” respectively. For at least the reason discussed above with respect to claim 1, claims 11 and 19 are not anticipated by Dardinski.

Dependent claims 2-9, 12-17 and 20-27 depend, directly or indirectly, from claims 1, 11, and 19, respectively. Therefore, having additional limitations, dependent claims 2-9, 12-17 and 20-27 are also not anticipated by Dardinski for at least the reasons discussed above.

Applicants respectfully request withdrawal of the 35 U.S.C. § 102(e) rejections on claims 1-9, 11-17, and 19-27 over Dardinski.

Furthermore, claim 2 recites “transmitting the user interface display **code** to a client digital processing system in response to a request to access the application.” However, Dardinski merely discloses transmitting the information to the target systems, wherein the information is the *information about the progress* in processing each object (Dardinski, col. 108, ln. 41-42, and 48-49). Dardinski does not disclose or imply transmitting user interface display code to a client digital processing system. For this additional reason, claim 2 is not anticipated by Dardinski. Claim 20 recites a similar limitation, and thus, is not anticipated by Dardinski for at least the reason discussed

above with respect to claim 2. Applicant respectfully request withdrawal of the rejection on claims 2 and 20.

Claim 4 sets forth that the user interface display code is hypertext markup language (HTML) code. In contrast, Dardinski does not disclose HTML code. It is respectfully submitted that the rejection of claim 4 under § 102(e) is improper because the reference relied upon does not disclose each and every limitation recited in claim 4. Although the Examiner argued that HTML is well-known as a language that defines structure and layout of an application user interface for people in the art, it is respectfully submitted that the invention as claimed is not HTML code by itself. The invention as claimed includes the limitation of dynamically generating HTML code (which is one example of the user interface display code) at run time, where the HTML code is based upon the set of configuration parameters. Applicants respectfully submit that the invention as claimed is novel and patentable. If the Examiner believes otherwise, Applicants respectfully request the Examiner to provide evidentiary support of such. Absent such submission of evidentiary support, Applicants submit that the rejection of claim 4 under 35 U.S.C. 102(e) based solely on Dardinski does not render the claim anticipated. Therefore, Applicants respectfully request withdrawal of the rejection. Since claim 22 also sets forth that the user interface display code is HTML code, claim 22 is not anticipated by Dardinski for at least the reason discussed above with respect to claim 4. Withdrawal of the rejection is respectfully requested.

Claim 5 recites “dragging **the object** to a desired location of the free-form grid layout.” In contrast, Dardinski merely discloses that *a symbolic representation* of that

definition is dragged and dropped into a view (Dardinski, col. 17, ln. 42-45). Therefore, Dardinski fails to anticipate claim 5 for this reason as well. Applicants respectfully request withdrawal of the rejection. Claim 23 recites “dragging the object to a desired location of the free-form grid layout,” and thus, is not anticipated by Dardinski for at least the reason discussed above with respect to claim 5. Withdrawal of the rejection is respectfully requested.

Claim 7 sets forth “selecting a **perimeter of the object** at a first location on the free-form grid layout and **dragging the perimeter** to a second location on the free-form grid layout.” In contrast, Dardinski merely discloses *a symbolic representation* of that definition is dragged and dropped into a view (Dardinski, col. 17, ln. 42-45). Dardinski does not disclose selecting a perimeter of the object and dragging the perimeter to a second location. Therefore, Dardinski fails to anticipate claim 7 for this reason as well. Applicants respectfully request withdrawal of the rejection. Claim 25 recites “selecting a perimeter of the object at a first location on the free-form grid layout and dragging the perimeter to a second location on the free-form grid layout,” and thus, is not anticipated by Dardinski for at least the reason discussed above with respect to claim 7. Withdrawal of the rejection is respectfully requested.

Claim 8 sets forth that the HTML code is dynamically generated **based upon the set of configuration parameters** and **based upon an origin of the request**. It is stated in the final Office Action that, “since the html defines the structure and the layout of an application, it’s definitely dynamically generated *based upon user’s request*.” (final Office Action, p. 6, right col., ln. 19-22; emphasis added). The limitation considered, i.e.,

“based upon user’s request,” is not the limitation recited in claim 8. Applicants respectfully request the Examiner to consider the limitations set forth in claim 8, which Darkinski fails to disclose. Therefore, Applicants respectfully request withdrawal of the rejection. Claim 26 recites similar limitations, and thus, is not anticipated by Dardinski for at least the reason discussed above with respect to claim 8. Withdrawal of the rejection is respectfully requested.

### **Rejections Under 35 U.S.C. § 103(a)**

Claims 10, 18, and 28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over “Dardinski” in view of U.S. Application US2004/0117773 of Nicolle (“Nicolle”). Applicants respectfully traverse the rejection. Claims 10, 18, and 28 depend indirectly from independent claims 1, 11, and 19, respectively, and thus, include the limitations set forth in their respective base claims. For at least the reason discussed above, Dardinski fails to disclose every limitation set forth in independent claims 1, 11, and 19. Moreover, Nicolle fails to make up the deficiencies of Dardinski. Nicolle merely discloses visualizing or graphically printing an automatism application programmed on a programming station using graphic automatism language on a computer terminal. Nicolle does not disclose or suggest dynamically generating user interface display code at run time, the user interface display code based upon the set of configuration parameters. Thus, a combination of Dardinski and Nicolle fails to disclose every limitation in claims 10, 18, and 28. For at least this reason, claims 10, 18, and 28 are patentable over Dardinski in view of Nicolle. Applicants respectfully request withdrawal of the rejections.

## CONCLUSION

Applicants respectfully submit that the rejections have been overcome by the remarks, and that the pending claims are in condition for allowance. Accordingly, Applicants respectfully request the rejections be withdrawn and the pending claims be allowed.

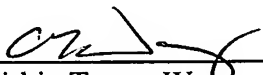
To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. If any other petition is necessary for consideration of this paper, it is hereby so petitioned.

If there are any additional charges, please charge Deposit Account No. 02-2666 for any fee deficiency that may be due.

Respectfully submitted,

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